

Case Name	DRI Set and Number	Description of each DRI	Documents Produced	Objections/Reasons Withheld	Burden	New Production	Date Produced
In Re: New York City Policing During Summer 2020 Demonstrations 20 Civ. 8924; 20 Civ. 10291; 20 Civ. 10541; 21 Civ. 322; 21 Civ. 533; 21 Civ. 1904 Second Amended Responses	DR No. 1	Provide all Documents concerning policies, procedures, directives, and training materials promulgated by NYPD relating to Officers' treatment of and response to demonstrations and protests (including mass protests), crowd control, crowd management, and/or "disorder control" that were created and/or in force prior to May 28, 2020, including, but not limited to, policies concerning: a) Officers' use of tactics or objects to control crowds during a demonstration or protest; b) Officers' use of force during a demonstration or protest; c) Use of force reporting and investigations related to uses of force during a demonstration or protest; d) Officers' use of batons or other instruments during a demonstration or protest; e) Officers' tactical use of other objects, such as shields and bicycles, during a demonstration or protest; f) Officers' use of Oleoresin Capsicum (also known as "OC" or "pepper spray") during a demonstration or protest; g) Technical Assistance Response Unit ("TARU") video and audio recording related to a demonstration or protest; h) Strategic Response and Strategic Response Group ("SRG") operations; i) Disorder Control Training; j) Officers' use of body worn cameras during a demonstration or protest; k) Officers' use of zip-ties or flex cuffs during a demonstration or protest; l) Officers' use of Kettling during a demonstration or protest; m) Officers' interaction with, and treatment of, Legal Observers during a demonstration or protest; n) Officers' interaction with, and treatment of, journalists, reporters, photographers, and members of the press during a demonstration or protest; o) Officers' enforcement of any applicable curfews in place during a demonstration or protest; p) Incident command, chain of command, and command and control during a demonstration or protest;	Responsive documents previously provided. Any additional responsive documents will be provided prior to the Court-ordered date. Responsive documents can be found in: VOL002_Confidential VOL005_Confidential VOL005_Not Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Not Confidential VOL014_Confidential VOL018_Confidential VOL019_Not Confidential VOL026_Confidential VOL031_Confidential VOL032_Confidential VOL035_Confidential VOL037_Confidential VOL039_Confidential	Bates ranges to be provided			
		q) Facilitation, accommodation, and escort of demonstrations or protests; r) First Amendment, Fourth Amendment, and Fourteenth Amendment principles applicable to policing demonstrations or protests, including the requirements that content-neutral restrictions on speech are narrowly tailored and provide ample alternatives for expression, as well as the need to provide fair warning before making certain Arrests or engaging in certain uses of force; s) The need to give dispersal orders and a meaningful opportunity to comply with them before making certain Arrests at a demonstration or protest; t) Policies, procedures, or protocols relating to racial profiling; u) Officers' use of race in law enforcement decisions and/or implicit bias; v) Officers' use of racial slurs or epithets; w) Officers' affiliation with or participation in groups or website that promote racists views; x) Officers' Arrest of individuals during a demonstration or protest, including procedures for effecting and processing large-scale or mass arrests; y) Probable cause to Arrest for a Protest-Related Violation or Offense; z) Discretion to Arrest for a Protest-Related Violation or Offense; aa) When to process an Arrest for a Protest-Related Violation or Offense for release with a summons or Desk Appearance Ticket, or for arraignment, including during a demonstration or a protest; bb) Officers' transportation of people Arrested during or after a demonstration or protest; cc) Officers' use of mass or large-scale arrest processing (including the use of a Mass Arrest Processing Center), including related to a demonstration or a protest; dd) Officers' provision of medical aid to civilians injured during a demonstration or protest; ee) Officers' wearing of face coverings when interacting with the public during or after a demonstration or protest, including during arrest processing; and ff) Any other policies, procedures, directives or training associated with policing large-scale events, including protests, demonstrations, and events involving civil disobedience.					
	DR No. 2	Provide all Documents concerning policies, procedures, directives, and training materials promulgated by NYPD during or after the Protests and relating to any and all subjects described in Request No. 1, including but not limited to training provided during or after October 2020, including recordings of such training, and any critique, evaluation, or review of the effectiveness of such training.	Responsive documents previously provided. Any additional responsive documents will be provided prior to the Court-ordered date. Defendants also refer Plaintiffs to the NYPD Patrol Guide, available at https://www1.nyc.gov/site/crb/investigations/nypd-patrol-guide.page . Defendants further refer Plaintiffs to information concerning training received by NYPD officers, available at https://www1.nyc.gov/site/nypd/bureaus/administrative/training.page . Defendants also refer Plaintiffs to NYPD's reform and Reinvention at https://www1.nyc.gov/site/nypd/about/about-nypd/reformcollaborative.page . Responsive documents can be found at: VOL002_Confidential VOL005_Confidential VOL005_Not Confidential				

	DR No. 3	Provide all Documents concerning policies, procedures, directives, and training materials relating to any and all subjects described in Request No. 1 promulgated during or following any protest events in the past 10 years concerning the deaths of persons in police custody or whose deaths were otherwise caused by an Officer, including, but not limited to, Ramarley Graham, Akai Gurley, Eric Garner, Delrawn Small, and Sean Bell.	Defendants also refer Plaintiffs to the NYPD Patrol Guide, available at https://www1.nyc.gov/site/ccrb/investigations/nypd-patrol-guide.page . Defendants further refer Plaintiffs to information concerning training received by NYPD officers, available at https://www1.nyc.gov/site/nypd/bureaus/administrative/training.page . Defendants also refer Plaintiffs to NYPD's reform and Reinvention at https://www1.nyc.gov/site/nypd/about/about-nypd/reformcollaborative.page . Responsive documents can be found at: VOL002_Confidential VOL005_Confidential VOL005_Not Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential			
	DR No. 4	Provide all Documents concerning policies, procedures, directives, and training materials relating to any and all subjects described in Request No. 1 promulgated during or following protests regarding the 2004 Republican National Convention or any of the lawsuits related to the policing of those protests.	Responsive documents previously provided. Additional documents will be provided prior to April 15, 2022, to include deposition transcripts and their exhibits as previously discussed and documents previously provided via FOIL request. Documents also available via NYCLU's website.			
	DR No. 5	For any and all training materials, presentations, or other similar materials responsive to Request Nos. 1-4 above, Documents sufficient to identify the dates trainings were held, all persons who attended, any statistical reports of the ranks of members of the service that attended, and any certifications issued to such attendees.	Defendants have been, and will continue to provide training information for named defendants and deponents. Defendants have provided documents concerning training received by named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward.	Defendants object to producing information regarding "all" trainings held as irrelevant and not proportional to the needs of the case. Additionally, information regarding training received by officers is publicly available.		
	DR No. 6	For each Officer identified in response to Interrogatory No. 1 in Plaintiffs' First Consolidated Set of Interrogatories to All Defendants, provide Documents sufficient to show whether and, if so, the date(s) that the Officer received training related to the subjects described in Request No. 1.	Defendants have been, and will continue to provide training information for named defendants and deponents. Defendants have provided documents concerning training received by named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward.			
	DR No. 7	For each Protest Location listed in the attached Schedule A, Documents sufficient to identify the intended roles or functions, deployments, commands, and instructions provided to each and every Officer who was assigned to, or who responded to, the Protest Location, including but not limited to documents identifying: a) The commanding Officer for each location; b) The full name, shield number, tax identification number, assigned command, and rank of each Officer deployed; c) Each Officer's assignment post, including the assignment address and borough; d) Any and all Officers assigned to supervise or oversee such deployment; e) Any attorneys from either the NYPD or the NYC Law Department at each location; f) All Threat Response Inquiry ("TRI"), Officer Injury Reports, Complaints, or other written documentation of any kind related to such deployment; g) All Unusual Incident or Occurrence Reports (PD370-152; UF-49); h) All instructions or directives regardless of form regarding police equipment and uniforms (including disorder control gear, face coverings, and so-called "mourning bands") to be worn or possessed by Officers during the assignment; i) Any communications relating to the decision to deploy Officers from the SRG and any instructions or directives provided to the SRG or Officers assigned to such deployments.	Responsive documents previously provided, including rosters and incident commander information. TRI's, line of duty reports to be provided. Defendants previously produced command logs responsive to this request - See Defendants' production, Vol. 035. Defendants have searched for Threat Response Inquiry reports (TRIs) for each Protest Location listed on Plaintiffs' Schedule A and are processing the documents located for production by the Court-ordered deadline. Some have been previously provided. Defendants have searched for and located documents responsive to this request, including "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division commands and will produce any responsive documents by the Court-ordered deadline. Responsive documents can be found at: VOL002_Confidential VOL003_Confidential VOL004 VOL005_Not Confidential VOL035_Confidential VOL037_Confidential VOL037_Not Confidential VOL039_Confidential VOL008_Confidential VOL008_Confidential_1 VOL008_Not Confidential			

	DR No. 8	<p>For each Protest listed on the attached Schedule A, provide the following Documents:</p> <ul style="list-style-type: none"> a) Any and all intelligence reports, threat assessments, and information compiled and/or reviewed in advance of and during the Protests, including all Documents reflecting Officers' planning for policing the Protests, and any spreadsheets or other lists of "scheduled" and "unscheduled" events during the time period surrounding each Protest; b) Any and all communications, tactical decisions, intelligence alerts, policies or other directives issued by any Officer as a result of such intelligence reports, assessments, or other information pertaining to the Protests; c) News clips, social media postings, and internet links gathered by the NYPD, including but not limited to such information and records gathered or created by the Office of the Deputy Commissioner for Public Information ("DCPI"), the Intelligence Division, or otherwise, related to any Protest; d) Requests for detail, Operations Unit (including Detail Section) records, "204s", "Who's Who," "Force Figures," "Detail Overview," roll calls, tactical plans, detail rosters, assignment sheets, internal communications, and other documents) concerning NYPD's deployment or assignment of Officers and resources relating to the Protests; e) Command Log(s) and other records created as a result of or related to the operation any Incident Command Post utilized in connection with policing a Protest; f) Records reflecting whether and, if so, by whom, when, and to what extent, dispersal orders or other warnings and opportunities to disperse or comply were given before enforcement action was taken at each Protest where force was used or detentions or Arrests were made; g) All To/From Memoranda, Unusual Occurrence Reports, U.F. 49s, Mass Arrest Reports and/or any other Documents consisting of summaries, reviews, recaps, evaluations, critiques, after-action reports, or other reports following any Protest, including but not limited to Joint Operations Center reports; h) All videos, including TARU videos, bodyworn camera videos, and Aviation Unit videos; 	<p>Responsive documents previously provided, including news clips, details, command logs, SPRINTS, command logs, MAPC records. Bates/Volume numbers to be provided. Any additional responsive documents will be provided prior to the Court-ordered date, including line of duty records, press inquiry records, etc.. Defendants previously produced news articles and press inquiries responsive to this request - See Defendants' production, Vol. 035. Defendants previously produced emails, details, command logs, SPRINTS, and MAPC records responsive to this request. Defendants have searched for and located documents concerning LRAD activation and documents concerning dispersal orders or other warnings, including MAPC worksheets, additional documents responsive to this request and are processing the documents located for production by the Court-ordered deadline. Defendants have searched for TRIs, TARU video, and Aviation Unit Video for each Protest Location listed on Plaintiffs' Schedule A and are processing the documents located for production by the Court-ordered deadline. Defendants have already produced all body-worn camera ("BWC") videos recorded by officers in connection with the events alleged by each of the consolidated plaintiffs, and for all individually-named defendant officers allegedly involved in said incidents with plaintiffs, plus BWC videos from other officers in close physical proximity to plaintiffs and the named defendants at the time of those alleged events, where possible; additionally, defendants have produced BWC footage for all defendant officers from all 83 protests on Schedule A for which they were present for any amount of time, as well as for all other officers whom plaintiffs have deposed to date, including non-party witnesses. Defendants are in the process of completing a search for MAPC documents AIDED Reports, and MTPs for each Protest Location listed on Plaintiffs' Schedule A and are processing the documents located for production by the Court-ordered deadline. Response documents can be found in: VOL002_Confidential VOL005_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential</p>	<p>As to plaintiffs' request set forth in Subsection 8(h) for all BWC footage from each one of the more than 83 protests listed on Schedule A, defendants object to this request on the ground that it would be unduly burdensome for defendants to locate, identify and produce the requested information, and that the request is not proportional to the needs of the case.</p>	<p>As to Subsection 8(h), it would be unduly burdensome for defendants to search for, identify, and produce all BWC videos in existence from every officer who was present for any portion of every single one of the more than 83 protests on Schedule A. First, defendants note that while the table in Schedule A contains only 83 rows and 83 corresponding "Protest Numbers," some entries in that table actually refer to multiple protests as they indicate a time period covering multiple dates, such as "Protest No. 63," which refers to all protests at a specified location from "June 23-30, 2020." Second, because plaintiffs have not identified any specific time frames, such as approximate start time to end time for the protests on Schedule A, where there was this only information provided to defendants -- in the absence of, e.g., the name of a plaintiff or any police officer -- defendants would be forced to undertake an enormous, labor-intensive, and incredibly time-consuming and wasteful effort to search for and attempt to identify all videos from the alleged protest. This is because: (a) without any particular hours to enter into the Evidence.com BWC database, the NYPD would have to conduct an unlimited, 24-hour search for all BWC videos for each such date on Schedule A, and then review all BWC video results individually to determine which might contain footage of the location indicated, in order to begin narrowing down the number of possible BWC videos from the protest indicated (notably, a search of the Evidence.com database conducted on 4/15/2022 for all BWC videos recorded City-wide on June 14, 2020 yielded over 10,000 videos, each of which NYPD would need to review individually, at least in part, to determine which were responsive); (b) only a fraction of NYPD officers had been issued the most updated body camera models in summer 2020, the Axon Body Camera-3 ("AB-3") -- which is the only type of BWC videos it is possible to search for by location in Evidence.com -- meaning that the overwhelming majority of all BWC footage recorded for all protests on Schedule A was done by officers using older models of body cameras and cannot be</p>	
		<p>i) All audio recordings, including audio recordings of NYPD Citywide and other radio communications;</p> <p>j) SPRINT reports related to recorded communications (and documents sufficient to decipher such SPRINT reports);</p> <p>k) Internal NYPD communications, including, but not limited to, e-mails, text messages, records regarding telephone calls made or received;</p> <p>l) Any and all TRI Reports, and any and all Incident Worksheets (PD370-154), and any and all TRI Incident-Investigating Supervisor's Assessment Reports (PD370-154A), any and all TRI Interaction Reports, all Unusual Incident Reports, including any and all other Documents relating to such reports and worksheets;</p> <p>m) Command Log(s) from each arrest processing location to which a person arrested in connection with a Protest was brought, including any Mass Arrest Processing Center ("MAPC");</p> <p>n) MAPC intake and processing records;</p> <p>o) Documents sufficient to identify all Arrests by Officers based on alleged conduct occurring at each Protest Location, including Documents sufficient to identify the number of such Arrests voided by the NYPD;</p> <p>p) For any Officer who was injured during any Protest, any related Line of Duty injury paperwork, including but not limited to AIDED Report(s), witness statement(s), and medical records;</p> <p>q) For any non-Officer injured related to a Protest, all records related to such injury, including any AIDED Report, Medical Treatment of Prisoner Form, Central Booking Medical Screening Form, Ambulance Call Report, Computer Aided Dispatch, FDNY Pre-Hospital Care Report, and other documents related to such injury;</p> <p>r) Documents concerning press inquiries received by Defendants and/or press releases or statements to the press made by individual Defendants or their agents related to any Protest, including such statements made in electronic communications such as e-mail or text messages.</p>				

	DR No. 9	<p>For each person identified in response to Interrogatory No. 6 in Plaintiffs' First Consolidated Set of Interrogatories to All Defendants, provide the following Documents:</p> <ul style="list-style-type: none"> a) Any and all records created by Officers related to each person Arrested, including all arrest processing paperwork; b) Online Booking System ("OLBS") Report (including handwritten/scratch version); c) Online Booking System Arrest Worksheet (PD244-159) (including handwritten/scratch version); d) Arrest Report – Supplement (PD244-157); e) Prisoner Pedigree Card (PD244-092); f) Arrest processing photographs, including digital movement slips and photographs taken as part of NYPD large-scale or mass arrest processing; g) Mass Arrest Pedigree Label (244-093); h) Complaint Report (313-152) (including handwritten/scratch version); i) Complaint Report Worksheet (313-152A) and Omniform Complaint Revision (including handwritten/scratch versions); j) Online Prisoner Arraignment ("OLPA") Report; k) Property Clerk Invoice (521-141); l) Records reflecting the disposition of property recorded in each such Property Clerk Invoice; m) Medical Treatment of Prisoner (244-150); n) Activity Logs (112-145) and other similar logs for the tour during which the incident occurred for any and all Officers involved; o) Scratch and/or memo book or activity log entries for any and all officers involved; p) C-Summons; q) Desk Appearance Ticket (PD 260-121); r) Desk Appearance Ticket Investigation Sheets (360-091); s) Records provided to any local prosecutor; t) DA Datasheets; u) Decline to Prosecute Forms; 	<p>Responsive documents previously provided including arrest records, property clerk invoices, activity logs and BWC for named defendants and deponents. Any additional responsive documents will be provided prior to the Court-ordered date. Defendants are in the process of completing searches for documents responsive to this request, including OLBS reports, arrest reports, arrest processing photographs, complaint reports, OLPA reports, property clerk invoices, activity logs, MTPs, C-summonses and DATs, and are processing the documents located for production by the Court-ordered deadline.</p> <p>Rssponsive documents can be found at: 20210804_Initial-Disclosure</p> <p>VOL005_Non Confidential VOL006_Confidential VOL006_Non Confidential VOL007_Confidential VOL007_Non Confidential VOL008_Confidential VOL008_Non Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Non Confidential VOL012_Confidential VOL013_Confidential VOL014_Confidential VOL018_Non Confidential VOL019_Confidential VOL019_Non Confidential VOL024_Non Confidential VOL026_Confidential VOL028_Confidential</p>			
		v) Criminal Court Complaint; and w) Body worn camera footage associated with their Arrest, including associated audit trails and activity logs				
	DR No. 10	<p>For each Protest Location listed in the attached Schedule A, provide Documents sufficient to identify all persons stopped by Officers during the Protests, including:</p> <ul style="list-style-type: none"> a) the date, time, and location of the encounter; b) the name, rank, shield number, and command of any and all Officers involved; c) the supervising Officer that made the decision and/or gave the order to stop the person; d) the identity of the person stopped; and e) the total number of stops disaggregated by race, date the stops occurred, and the precinct of the Officers involved. 	<p>Responsive documents previously provided with respect to all individuals for whom paperwork was generated. Any additional responsive documents will be provided prior to the Court-ordered date. Defendants are in the process of searching for stop reports responsive to this request for each Protest Location listed on Plaintiffs' Schedule A and are processing the documents located for production by the Court-ordered deadline.</p> <p>Responsive documents can be found at: 20210804_Initial-Disclosure</p> <p>VOL005_Non Confidential VOL006_Confidential VOL006_Non Confidential VOL007_Confidential VOL007_Non Confidential VOL008_Confidential VOL008_Non Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Non Confidential VOL012_Confidential VOL013_Confidential VOL014_Confidential VOL018_Non Confidential VOL019_Confidential VOL019_Non Confidential VOL024_Non Confidential VOL026_Confidential VOL028_Confidential</p>			

	DR No. 11	<p>For each Protest Location listed in the attached Schedule A, provide Documents sufficient to identify all Arrests by Officers at such Protest Location, including but not limited to:</p> <ul style="list-style-type: none"> a) the total number of Arrests; b) the total number of summonses related to those Arrests issued disaggregated by race, date the summons was issued, and the command of the issuing Officers; c) the total number of DATs issued related to those Arrests disaggregated by race, date the DAT was issued, and the command of the issuing Officers; d) the total number of arrests processed on-line related to those Arrests disaggregated by race, date of arrest, and the command of the arresting Officers; e) the summons number, DAT number, and/or arrest number associated with each Arrest; f) the full name, shield number, and tax identification number of the issuing or arresting Officer; g) the identity of the person Arrested; h) location where the Arrest occurred (i.e., borough and address); i) length of time of custodial detention, including date and time of stop and date and time of release; j) criminal charge(s); and k) disposition of any such charge(s). 	<p>Defendants previously produced arrest records for the named defendants and deponents in response to this request. Defendants are in the process of completing searches for additional documents responsive to this request, including OLBS reports, arrest reports, arrest processing photographs, OLPA reports, MAPC documents, and C-summonses, and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: 20210804_Initial-Disclosure</p> <p>VOL005_Not Confidential VOL006_Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL012_Confidential VOL013_Confidential VOL014_Confidential VOL018_Not Confidential VOL019_Confidential VOL019_Not Confidential VOL024_Not Confidential VOL026_Confidential VOL028_Confidential</p>			
	DR No. 12	Provide all Documents relating to policies, procedures, directives, and training materials regarding use of force reporting and investigation, including the completion of the TRI Incident Worksheets (370-154) and the TRI Incident-Investigating Supervisor's Assessment Reports (370-154A), including but not limited to the Data Entry Guide for Threat, Resistance or Injury (TRI) Incident Worksheet (SP542).	Provide all Documents relating to policies, procedures, directives, and training materials regarding use of force reporting and investigation, including the completion of the TRI Incident Worksheets (370-154) and the TRI Incident-Investigating Supervisor's Assessment Reports (370-154A), including but not limited to the Data Entry Guide for Threat, Resistance or Injury (TRI) Incident Worksheet (SP542).			
	DR No. 13	<p>For each Protest Location listed in the attached Schedule A, provide Documents sufficient to identify each and every use of force by an Officer, including but not limited to information sufficient to show:</p> <ul style="list-style-type: none"> a) the type of force used; b) date/time when used; c) the full name, shield number, and tax identification number of the Officer using force; d) the assigned command of the Officer using force; e) supervising Officer(s); f) whether the Officer was on-duty or off-duty; g) the location where the incident occurred (including borough); h) the race and gender of individual against whom force was used; and i) the factual circumstances surrounding the force used. 	<p>Responsive documents previously provided. Any additional responsive documents, including TRI's to the extent not previously provided, will be provided prior to the Court-ordered date. Defendants have searched for Threat Response Inquiry reports (TRIs) for each Protest Location listed on Plaintiffs' Schedule A and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: 20210804_Initial-Disclosure</p> <p>VOL007_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL010_Confidential VOL011_Confidential VOL014_Confidential VOL031_Confidential</p>			
	DR No. 14	<p>For each Protest Location listed in the attached Schedule A, provide all Documents concerning any incidents currently or formerly under investigation or referred for internal investigation by the NYPD (including but not limited to the Internal Affairs Bureau ("IAB"), the Chief of Department ("COD"), Department Advocates Office, Office of the Chief of the Department, Risk Management Bureau, and/or Patrol Bureau Investigations) including all related complaints, log entries, record reviews, video and audio recordings, all recordings of interrogations of the members of service, interviews of any and all non-members of service as well as members of services, body-worn camera footage and associated audit trails and activity logs, and radio transmissions, TARU recordings and any other recordings (such as Argus videos) and/or, and any other Documents collected, considered, or reviewed, and any determinations, disciplinary recommendations, settlement offers, case analysis, or other outcome recommendations made by any person within the NYPD with respect to any occurrence that happened at such Protest Location.</p>	<p>Defendants previously produced documents responsive to this request. Defendants have searched for additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including IAB reports and related documents, TARU video, Argus video, and "49s" from the shared drives of the Internal Affairs Bureau, and the Office of the Chief of Department, and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at 20210804_Initial-Disclosure</p> <p>VOL007_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL010_Confidential VOL011_Confidential VOL014_Confidential VOL031_Confidential VOL035_Confidential VOL037_Confidential</p>			
	DR No. 15	For each Protest Location listed in the attached Schedule A, provide all Documents concerning any incidents currently or formerly under investigation or referred for investigation by the Civilian Complaint Review Board ("CCRB") including all related complaints, video (including Argus video) and audio recordings, body-worn camera footage and radio transmissions, investigator notes and reports, and any other Documents collected, considered, or reviewed, and any determinations, disciplinary recommendations, or other outcome recommendations made by the NYPD or CCRB with respect to any occurrence that happened at such Protest Location.	Defendants previously produced all CCRB file documents responsive to this request - See Defendants' production, Vol. 035 and Vol. 037.			

	DR No. 16	<p>For each Officer identified in response to Interrogatory Nos. 8 and/or 9 in Plaintiffs' First Consolidated Set of Interrogatories to All Defendants, all personnel-related records in the possession of the NYPD or the City of New York, including but not limited to:</p> <ul style="list-style-type: none"> a) Records reflecting the Officer's histories as to CCRB and IAB investigations, as well as underlying records; b) The Academy Transcript and all training logs and other records reflecting the NYPD training each Officer received at the NYPD Academy and after graduating the NYPD Academy; c) Central Personnel Index ("CPI") file records or similarly defined records; d) Any and all records concerning internal NYPD disciplinary action, letters in the personnel file, command discipline, chores and specifications, transfers, and/or warnings and admonishments; e) Performance profiles, or similarly defined records; f) Psychological Services Unit ("PSU") records or similarly defined records; g) Risk Assessment Information Liability System ("RAILS") records; h) Early warning or intervention records or similarly defined records; i) Supervisor complaint reports or command discipline election reports; j) Any and all letters requesting sealing of disciplinary records or charges; k) Any and all documents related to performance monitoring; l) Giglio profiles and/or similar resume providing information regarding all internal NYPD and CCRB complaints, investigations, and dispositions, including the Police Commissioner's case analysis; m) Records from the Internal Affairs Bureau, Inspectional Services Division, Office of the Chief of the Department, or Department Advocates Office; n) The caption, complaint, and records reflecting the disposition of any and all lawsuits against each such Officer; o) To the extent not covered in the preceding sub-paragraphs, all Documents relating to any civilian or departmental-generated complaints of police misconduct, dereliction of duty or violation of the New York State penal laws or regulations of the NYPD, including but not 	<p>Defendants have provided documents concerning CCRB and IAB investigations, and training records of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including IAB reports and related documents, and have requested and received from the CCRB additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, and are processing the documents located for production by the Court-ordered deadline. Responsive documents were produced pursuant to the deposition protocol, and can be found at VOL001 VOL002_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Confidential_1 VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL012_Confidential VOL014_Confidential VOL018_Not Confidential VOL022_Confidential VOL024_Not Confidential VOL026_Confidential VOL028_Confidential VOL029_Confidential VOL030_Confidential VOL031_Confidential VOL032_Confidential VOL035_Not Confidential VOL037_Confidential</p>			
	DR No. 17	<p>Provide all Documents concerning Officers receiving discipline for misconduct occurring during the Protests, or who have been recommended to receive discipline for such misconduct.</p>	<p>Defendants have provided documents concerning CCRB and IAB investigations of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have also provided all CCRB reords with respect to the Protests. Responsive documents avaialbe at: VOL001 VOL002_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Confidential_1 VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL012_Confidential VOL014_Confidential VOL018_Not Confidential VOL022_Confidential VOL024_Not Confidential VOL026_Confidential VOL028_Confidential VOL029_Confidential VOL030_Confidential VOL031_Confidential VOL032_Confidential VOL035_Confidential VOL035_Not Confidential VOL037_Confidential</p>			
	DR No. 18	<p>Provide all Documents concerning communications from May 25, 2020 to present between and among any and all NYPD personnel and personnel of the Office of the Mayor, including Mayor de Blasio or his designees, and the Mayor's Office of Criminal Justice, regarding NYPD's planning for and response to any protest anticipated to take place in New York City following the death of George Floyd, including but not limited to the Protests.</p>	<p>Responsive documents previously provided in email discovery. Defendants have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request, and will produce non-privileged responsive documents identified by the Court-ordered deadline.</p>			
	DR No. 19	<p>Provide all Documents concerning communications about any protest anticipated to take place in New York City following the death of George Floyd, including but not limited to the Protests from May 25, 2020 to present, by Defendants Mayor de Blasio, Commissioner Shea, Chief Monahan, and all Borough Commanders, and Deputy Commissioner of Intelligence John Miller.</p>	<p>Responsive documents previously provided in email discovery.] Defendants have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request, and will produce non-privileged responsive documents identified by the Court-ordered deadline.</p>			
	DR No. 20	<p>Provide all documents received by, referenced, or reviewed by Mayor de Blasio, Commissioner Shea, and/or Chief Monahan, Borough Commanders, Deputy Commissioner of Intelligence John Miller, and Incident Commanders documenting occurrences and/or interactions between Officers and civilians at any and all Protest Locations from May 28, 2020, to present.</p>	<p>Defendants have previously produced emails responsive to this request. Defendants have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request, and will produce non-privileged responsive documents identified by the Court-ordered deadline.</p>			

	DR No. 21	For each Protest Location listed in the attached Schedule A, provide all communications between and among any Officers supervising, commanding, or otherwise directing NYPD's response to the Protests at each Protest Location, including but not limited to communications between and among Borough Commanders, SRG Command, and Deputy Commissioner of Intelligence John Miller.	Responsive documents previously provided. Any additional responsive documents will be provided prior to the Court-ordered date. Defendants have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request, and will produce non-privileged responsive documents identified by the Court-ordered deadline. Responsive documents provided in email discovery and at VOL005_Not Confidential VOL010_Confidential			
	DR No. 22	Provide all Documents, including all non-privileged communications, in Defendants' possession, custody, or control concerning the December 30, 2020 Corporation Counsel Report Pursuant to Executive Order 58 (June 20, 2020) Directing an Analysis of Factors Impacting the George Floyd Protests in New York City, including any and all Documents received or reviewed by Corporation Counsel in preparing such report.				
	DR No. 23	Provide all Documents, including all non-privileged communications, in Defendants' possession custody, or control concerning the December 2020 Report by the New York City Department of Investigation ("DOI") titled: Investigation into NYPD Response to the George Floyd Protests, including any and all Documents received or reviewed by DOI in preparing such report.	Responsive documents previously provided. Responsive documents can be found at: VOL003_Confidential VOL005_Not Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL015_Not Confidential VOL017_Confidential VOL018_Not Confidential VOL039_Confidential			
	DR No. 24	Provide all Documents concerning any communications between any NYPD personnel, including from the Community Affairs Bureau and/or any other neighborhood policing liaisons and organizers of the Protests.	Defendants have previously produced emails responsive to this request. Defendants have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request, and will produce non-privileged responsive documents identified by the Court-ordered deadline. Responsive documents can be found at: VOL005_Confidential VOL005_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL015_Not Confidential			
	DR No. 25	Provide all Documents concerning reports, reviews, communications, discussions, assessments, and analyses, including but not limited to after-action reviews, Sentinel Event reviews, postmortem reviews, and project debriefs, concerning the NYPD's deployment of officers to protests related to Occupy Wall Street (2011-2012) and in response to the death of Eric Garner (2014-2015).	Responsive documents are currently being searched for in Law Department files and NYPD files. Responsive documents will be provided prior to April 15, 2022			
	DR No. 26	Provide all Documents concerning the decision by then-District Judge Richard Sullivan concerning defendant Monahan's actions as reported in <i>Dinler v. City of New York</i> , No. 04 Civ. 7921 (RJS) (JCF), 2012 U.S. Dist. LEXIS 141851, at *27-39 (S.D.N.Y. Sept. 30, 2012), including but not limited to discipline of defendant Monahan, changes in policies, directives, orders, and/or instructions concerning group arrests.	No responsive documents exist.			
	DR No. 27	Provide all Documents concerning the jury's verdict against defendant Monahan in <i>Abdell v. City of New York</i> , No. 05 Civ. 8453 (RJS) (S.D.N.Y.), including but not limited to discipline of defendant Monahan.	No responsive documents exist.			
	DR No. 28	Provide all Documents concerning the payment of the punitive damages awarded in <i>Abdell v. City of New York</i> , No. 05 Civ. 8453 (RJS) (S.D.N.Y.).	No responsive documents exist.			
	DR No. 29	Provide all Documents concerning any disciplinary action taken regarding Deputy Inspector Edward Winski concerning his actions during Occupy Wall Street protests, which were the subject of several litigations: <i>Vincent v. Winski</i> , No. 14 Civ. 7744; <i>Gersbacher v. Winski</i> , No. 14 Civ. 7600.	No responsive documents exist.			

	DR No. 30	Provide all Documents concerning any complaint made to, or investigation by the NYPD or CCRB, of any NYPD officer displaying a "white power" symbol during any of the Protests listed on the attached Schedule A.	Defendants have provided documents concerning all protest-related CCRB complaints and investigations, and IAB investigations, of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including IAB reports and related documents; have requested and received from the CCRB additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A; and have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request; and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: VOL001 VOL002_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Confidential_1 VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL012_Confidential VOL014_Confidential VOL018_Not Confidential VOL022_Confidential VOL024_Not Confidential VOL026_Confidential			
	DR No. 31	Provide all Documents concerning any complaint made to or investigation by the NYPD or CCRB, of any NYPD officer for making racist statements or for racist conduct, including but not limited to, racial profiling.	Defendants have provided documents concerning all protest-related CCRB complaints and investigations, and IAB investigations, of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including IAB reports and related documents; have requested and received from the CCRB additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A; and have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request; and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: VOL001 VOL002_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Confidential_1 VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL012_Confidential VOL014_Confidential VOL018_Not Confidential VOL022_Confidential VOL024_Not Confidential VOL026_Confidential			

	DR No. 32	Provide all Documents concerning any investigation into, or assessments of, NYPD officers' possible affiliations with racist or white supremacist organizations, including but not limited to IAB, Intelligence or Anti-terrorism unit investigations or assessments.	Defendants have provided documents concerning all protest-related CCRB complaints and investigations, and IAB investigations, of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including IAB reports and related documents; have requested and received from the CCRB additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A; and have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request; and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: VOL001 VOL002_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Confidential_1 VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL012_Confidential VOL014_Confidential VOL018_Not Confidential VOL022_Confidential VOL024_Not Confidential VOL026_Confidential			
	DR No. 33	Provide all Documents concerning investigations into, or assessments of, NYPD officers' possible affiliations with Proud Boys, Oath Keepers, Three Percenters, or other far-right or neo-Nazi organizations, including but not limited to IAB, Intelligence or Anti-terrorism unit investigations or assessments.	Defendants have provided documents concerning all protest-related CCRB complaints and investigations, and IAB investigations, of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including IAB reports and related documents; have requested and received from the CCRB additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A; and have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request; and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: VOL001 VOL002_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Confidential_1 VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL012_Confidential VOL014_Confidential VOL018_Not Confidential VOL022_Confidential VOL024_Not Confidential VOL026_Confidential			
	DR No. 34	All Documents concerning any investigation into NYPD officers' participation in online far-right/racist message boards, such as the Law Enforcement Rant site Deputy Inspector James Kobel posted on (see Sierra First Amended Complaint at ¶¶ 166-168).	As previously stated, the NYPD Intelligence Bureau has no documents responsive to this request. IAB, Chief of Department and other relevant locations are being searched. Documents, if any, to be provided prior to Court-ordered deadline.			

	DR No. 35	Provide all Documents concerning any discipline of any NYPD officer for use of racist language during the Protests.	Defendants have provided documents concerning all protest-related CCRB complaints and investigations, and IAB investigations, of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A, including IAB reports and related documents; have requested and received from the CCRB additional responsive documents for each Protest Location listed on Plaintiffs' Schedule A; and have searched the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are in the process of completing a search of the shared drive of the Intelligence Division command for documents responsive to this request; and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: VOL001 VOL002_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Confidential_1 VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL012_Confidential VOL014_Confidential VOL018_Not Confidential VOL022_Confidential VOL024_Not Confidential VOL026_Confidential			
	DR No. 36	Provide all Unusual Incident reports (UF-49s), after-action reports, to/from memoranda, and Mass Arrests Reports, made or maintained at any time, concerning the following protests: a) World Economic Forum protests in 2002; b) Republican National Convention protests in 2004; c) Occupy Wall Street in 2011 and 2012; d) Black Lives Matter protests between 2013 and 2020; e) Pro-Trump car caravans on November 1, 2020.	Defendants have searched the shared drives of the Criminal Justice Bureau with the assistance of NYPD Lt. Stephen Czark for documents responsive to this request, including MAPC documents, and are processing the documents located for production by the Court-ordered deadline. With respect to documents concerning the protests related to the Republican National Convention in 2004, Defendants refer Plaintiffs to documents concerning the RNC protests produced in response to a previous FOIL request by Plaintiff NYCLU, located at: https://www.nyclu.org/en/policing-protest-nypds-republican-national-convention-documents ; and to eight (8) deposition transcripts from RNC-related lawsuits produced by Defendants via email on February 17, 2022. In addition, Defendants have located documents related to the RNC protests stored on an internal New York City Law Department database as well as additional deposition transcripts and are processing the documents for production by the Court-ordered deadline.			
	DR No. 37	Provide all Documents concerning complaints, made at any time, alleging NYPD excessive force and use of racial epithets during policing of each protest listed in Request No. 36.	Defendants will provide electronically saved documents concerning complaints of excessive force, and racial epithets to the extent possible, during the mentioned protests from 2004-on, as previously agreed	Overly burdensome and not proportional to the needs of the case	Records prior to 2012 are not in electronic format, therefore difficult to searchfiles are not in electronic format and paper copies are in storage in one of three places. Depending on if they were indexed clearly and properly, they may be difficult to locate. From 2012 through 2018, "outside guidelines" files are paper only, some are in storage, and the same issues as above apply. Logs however, and not the entire files, are available in electronic format, but contain limited information. Moreover, the search functionality of the electronic system is limited. Excessive force complaints are a searchable category, however "racial epithets" is not. Moreover, it is unclear if date of incident is a searchable category, making it difficult to limit the searches to a particular date of incident. In order to find complaints of use of racial epithets, each complaint would have to be individually reviewed for that information. It is estimated that it would take at least 250 hours to search for all requested documents, plus an additional 150 hours to review, redact, and produce them.	
	DR No. 38	Provide all Documents sufficient to identify all Arrests effected by Officers at each protest listed in Request No. 36, including the following information: a) the total number of Arrests; b) the total number of summonses related to those Arrests issued disaggregated by race, date the summons was issued, and the command of the issuing Officers; c) the total number of DATs issued related to those Arrests disaggregated by race, date the DAT was issued, and the command of the issuing Officers; d) the total number of arrests processed on-line related to those Arrests disaggregated by race, date of arrest, and the command of the arresting Officers; e) the summons number, DAT number, and/or arrest number associated with each Arrest; f) the full name, shield number, and tax identification number of the issuing or arresting Officer; g) the identity of the person Arrested; h) location where the Arrest occurred (i.e., borough and address); i) length of time of custodial detention, including date and time of stop and date and time of release; j) criminal charge(s); and k) disposition of any such charge(s).	Mass arrest reports/MAPC spreadsheets to be provided prior to the Court deadline, to the extent not already provided. Personally identifying information of the arrestees is redacted pursuant to CPL 160.50. Responsive documents can be found at : 20210804_Initial-Disclosure VOL002_Confidential VOL003_Confidential VOL005_Not Confidential VOL006_Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL014_Confidential VOL018_Confidential VOL019_Confidential VOL026_Confidential VOL027_Confidential VOL035_Confidential VOL037_Confidential VOL037_Not Confidential VOL039_Confidential			

	DR No. 39	Provide all Documents reflecting NYPD policies and practices in effect during the Protests regarding who is authorized to determine when a person related to a protest or demonstration may be released with a Summons or DAT, including any relevant NYPD Patrol Guide provisions.	Defendants have previously produced portions of the NYPD Patrol Guide and training documents responsive to this request. Defendants also refer Plaintiffs to the NYPD Patrol Guide, available at https://www1.nyc.gov/site/ccrb/investigations/nypd-patrol-guide.page . Responsive documents can be found at: VOL002_Confidential VOL005_Confidential VOL005_Not Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Not Confidential VOL014_Confidential VOL018_Confidential VOL019_Not Confidential VOL026_Confidential VOL031_Confidential VOL032_Confidential VOL035_Confidential VOL037_Confidential VOL039_Confidential			
	DR No. 40	Provide all Documents reflecting NYPD policies and practices in effect during the Protests regarding the steps involved in processing an Arrest for a Protest-Related Violation or Offense outside of a protest or demonstration.	Defendants have previously produced portions of the NYPD Patrol Guide and training documents responsive to this request. Defendants also refer Plaintiffs to the NYPD Patrol Guide, available at https://www1.nyc.gov/site/ccrb/investigations/nypd-patrol-guide.page . Responsive documents can be found at: VOL002_Confidential VOL005_Confidential VOL005_Not Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Not Confidential VOL014_Confidential VOL018_Confidential VOL019_Not Confidential VOL026_Confidential VOL031_Confidential VOL032_Confidential VOL035_Confidential VOL037_Confidential VOL039_Confidential			
	DR No. 41	Provide all Documents reflecting NYPD policies and practices in effect during the Protests regarding the steps involved in processing an Arrest for a Protest-Related Violation or Offense related to a protest or demonstration.	Defendants have previously produced portions of the NYPD Patrol Guide and training documents responsive to this request. Defendants also refer Plaintiffs to the NYPD Patrol Guide, available at https://www1.nyc.gov/site/ccrb/investigations/nypd-patrol-guide.page . Responsive documents can be found at: VOL002_Confidential VOL005_Confidential VOL005_Not Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Not Confidential VOL014_Confidential VOL018_Confidential VOL019_Not Confidential VOL026_Confidential VOL031_Confidential VOL032_Confidential VOL035_Confidential VOL037_Confidential VOL039_Confidential			
	DR No. 42	Provide the Academy Transcript and all training logs and other records reflecting the NYPD training each named Defendant received at the NYPD Academy and after graduating the NYPD Academy.	Defendants have provided documents concerning training received by named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants also refer Plaintiffs to information concerning training received by NYPD officers, available at https://www1.nyc.gov/site/nypd/bureaus/administrative/training.page . Responsive documents were produced, and will continue to be produced pursuant to the deposition protocol.			
	DR No. 43	For each and every dataset produced pursuant to these Requests or in response to any of Plaintiffs' Interrogatories, provide any and all data dictionaries identifying and defining all terms and codes used in each field of the dataset.	No data dictionaries exist.			

	DR No. 44	Provide all documents identified or relied upon in responding to Plaintiffs' Interrogatories served in these Actions	Defendants refer Plaintiffs to all documents produced in this litigation, and those to be produced prior to the Court Ordered deadline. These documents, as well as privileged communications between the Law Department and City agencies, including NYPD, OTM, CCRB, DOI were relied upon in responding to the interrogatories.			
In Re: New York City Policing During Summer 2020 Demonstrations 20 Civ. 8924 Second Consolidated Set of Document Requests	DR No. 45	Produce all the documents identified in Defendants' Initial Disclosures to the extent they have not been produced.	Responsive documents were provided, bearing Bates Nos. DEF000001-DEF000475			
	DR No. 46	Produce copies of all subpoenas Defendants served on any party, or any individual or entity, concerning this litigation.	No responsive documents exist, as no subpoenas were served.			
	DR No. 47	Produce all documents received in response to any subpoenas served.	No responsive documents exist, as no subpoenas were served.			
	DR No. 48	Produce any and all organizational chart(s) or other similar documents showing or explaining the organizational structure of the NYPD, including information providing identification of the leadership and the command structure of every component part or organizational unit within NYPD.	Organizational Guide to be provided in 4/15/2022 production. See Bates Nos. DEF000458296-DEF000. This is the only document that explains the organizational structure of the NYPD.	Defendants object to producing the documents referred to by Bridget Fitzpatrick during meet and confers, as, upon further review, they are simply "phone books" and do not contain any information on the organizational structure of the NYPD. As such they are not responsive to this request.		
	DR No. 49	Produce all documents concerning the City of New York's contention that, "[c]lose to 400 NYPD personnel were injured," at Protests as stated on page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	Defendants have searched for and located documents responsive to this request, including Line of Duty reports and AIDED reports are processing the documents located for production by the Court-ordered deadline. In addition, Defendants have searched for "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division commands and will produce any responsive documents by the Court-ordered deadline. Some documents, already produced, can be found at: VOL005_Confidential VOL007_Not Confidential VOL014_Confidential VOL035_Confidential VOL037_Confidential			
	DR No. 50	Produce all documents concerning any NYPD officer who was injured at a Protest.	Defendants have searched for and located documents responsive to this request, including Line of Duty reports and AIDED reports are processing the documents located for production by the Court-ordered deadline. In addition, Defendants have searched for "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division commands and will produce any responsive documents by the Court-ordered deadline. Some documents, already produced, can be found at: VOL005_Confidential VOL007_Not Confidential VOL014_Confidential VOL035_Confidential VOL037_Confidential			
	DR No. 51	Produce all HIPAA releases for all medical providers that treated any NYPD officer who was injured at a Protest, including the 4 officers whose photos are on page 5 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	Defendants will produce all HIPAA released for named defendant officers who have agreed to provide one by the Court-ordered deadline.	Defendants object to this request to the extent it seeks HIPAA releases for non-party offices, on the grounds that there is no requirement to produce HIPAA releases for non-parties. Notwithstanding this objection, Defendants will reach out to injured non-party officers to ascertain whether they will agree to provide HIPAA releases, and will produce any such releases as received on a rolling basis.		
	DR No. 52	Produce all documents concerning the City of New York's contention that, "[p]rotestors set police cars ablaze; vandalized precinct houses; threw rocks, bricks, bottles at officers; stabbed, punched, bit officers; and hurled Molotov cocktails at officers," as stated on page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	Defendants have provided documents responsive to this request, including emails, and also AIDED reports and Line of Duty Reports of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. Defendants have searched for additional documents, including AIDED Reports, Line of Duty reports, Fleet service reports, and other documents responsive to this request and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: VOL005_Confidential VOL007_Not Confidential VOL014_Confidential VOL035_Confidential VOL037_Confidential VOL001 VOL005_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL017_Confidential VOL018_Not Confidential VOL022_Not Confidential VOL024_Not Confidential 20210804_Initial-Disclosure VOL005_Not Confidential VOL006_Confidential VOL006_Not Confidential VOL007_Confidential VOL007_Not Confidential VOL008_Confidential			

	DR No. 53	Produce all documents concerning any violence by participants of any Protest.	Defendants have provided documents responsive to this request, including emails, and also AIDED reports and Line of Duty Reports of named defendants and deponents pursuant to the agreed-upon deposition protocol, and will continue to provide responsive documents for named defendants and deponents going forward. In addition, Defendants previously produced news articles and press inquiries responsive to this request - See Defendants' production, Vol. 035. Defendants have searched for additional documents, including AIDED Reports, Line o Duty reports, Fleet service reports, and other documents responsive to this request and are processing the documents located for production by the Court-ordered deadline. Responsive documents can be found at: VOL001 VOL005_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL014_Confidential VOL017_Confidential VOL018_Not Confidential VOL022_Not Confidential VOL024_Not Confidential VOL035_Confidential VOL005_Confidential VOL007_Not Confidential VOL014_Confidential VOL035_Confidential VOL037_Confidential			
	DR No. 54	Produce all documents concerning the City of New York's contention that, "The City of New York already has committed to implementing numerous changes to the NYPD, recommended in the wake of these unprecedented protests, and is also finalizing a Reform and Reinvention Plan, required by the State of New York of all localities receiving state funds," as stated on page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	Defendants refer Plaintiffs to the New York City Police Reform and Reinvention Collaborative website available at at https://www1.nyc.gov/site/policereform/index.page , provided previously.			
	DR No. 55	Produce all documents concerning the City of New York's contention that, "there is no history of unlawful policing [by the NYPD] at protests" and "there is no history of unconstitutional policing at protests by NYPD," as stated on page 2 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	Defendant refer plaintiffs to publicly available media sources, and the jury verdicts/settlements/Orders on motions in lawsuits against the City of New York/ NYPD officers arising from Occupy Wall Street Protests, WEF Protests and Anti-War Protests. Defendants do not have any particular documents to prove this negative, other than settlement agreements which do not admit fault, at least 5 defense verdicts, and numerous Rule 12 and Rule 56 decisions in thier favor.			
	DR No. 56	Produce all documents concerning the City of New York's contention that, "police seized hammers, lighter fluid, gas masks, and fireworks from protesters headed to the Mott Haven protests on June 4, 2020," as stated on page 6 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	Defendants refer Plaintiffs to previously produced documents responsive to this request, including DEF000195-DEF000196; DEF000201-DEF000203; DEF000210-DEF000212; DEF000273-DEF000277. Defendants are in the process of completing searches for additional documents responsive to this request, including OLBS reports, arrest reports, and property clerk invoices, and are processing the documents located for production by the Court-ordered deadline.			
	DR No. 57	Produce all documents concerning the City of New York's contention that, "[i]n response to the unprecedented protests and at the Governor's directive, the City of New York is revamping policing, including policing at protests," as stated on page 6 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).	Defendants refer Plaintiffs to the New York City Police Reform and Reinvention Collaborative website available at at https://www1.nyc.gov/site/policereform/index.page , provided previously, as well as updated patrol guide procedures from October 2020-present.			
	DR No. 58	Produce all drafts of any "plans for reinventing the police," as stated on page 6 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106), submitted by the Mayor, and all documents concerning those drafts.	Defendants will not produce documents responsive to this request.	Defendants object to this request on the grounds that is seeks draft documents protected by the deliberative process privilege as well as documents protected by the attorney client privilege.		
	DR No. 59	Produce all documents concerning the City of New York's contention that it accepted "all 30 collective recommendations from both agencies" as stated on Page 7 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106), as well as documents concerning those recommendations.	Defendants refer Plaintiffs to the New York City Police Reform and Reinvention Collaborative website available at at https://www1.nyc.gov/site/policereform/index.page , provided previously.			
	DR No. 60	Produce all documents concerning the City of New York's contention that it accepted "the City has implemented (and is considering implementing) a plethora of actions, including drafting a new policy concerning First Amendment rights at protests and disorder control tactics; assessing existing training to develop new content related to protest, de-escalation, and crowd psychology," as stated on Page 7 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106), as well as documents concerning those policies and trainings.	Defendants refer Plaintiffs to the New York City Police Reform and Reinvention Collaborative website available at at https://www1.nyc.gov/site/policereform/index.page , provided previously.			

	DR No. 61	Produce all documents concerning the nature and structure of each of the below-listed databases and/or information systems, including, but not limited to, documents sufficient to identify the database(s) or other location(s) in which the underlying data housed in or accessible through each NYPD front-end system are stored, and including documents concerning: the information contained in each database and system; the fields in each database and system; the manner in which changes to the database/information system are logged; how audit logs are created and stored in the database and system; documentation of what information is stored in the database and system and how it is stored; all of the ways in which the database and system can be searched and queried; how information can be exported from the database and system; and any and all documents concerning training materials used in training users of the database or system. a.NYPD's Crime Database Warehouse (CDW) and any related database(s); b.NYPD's Domain Awareness System (DAS) and any related database(s); c.NYPD's Omnidata System and any related database(s); d.NYPD's Real Time Crime Center (RTCC) and any related database(s); e.NYPD's Electronic Case Management System (ECMS) and any related database(s); f.NYPD's Property and Evidence Tracking System (PETS) and any related database(s); g.NYPD's Activity Log - Electronic memo book application and any related database(s); h.NYPD's Department iPhones and iPads; i.NYPD's Finest Online Records Management System (FORMS) and related database(s); j.NYPD's Automated Roll Call System (ARCS) and related database(s); and k.NYPD camera ESI storage systems and related database(s), including, but not limited to, such systems and databases related to Body Worn Cameras (BWC) footage; Technical Assistance and Response Unit (TARU) footage (including the TARU Job Tracker system); Aviation Unit footage; ARGUS closed circuit television (CCTV) systems; and NYPD facility camera footage (including Mass Arrest Processing Center (MAPC) footage).	Defendants will not produce documents responsive to this request.	Defendants object to this request on the grounds that the burden and expense of locating the documents sought is not proportional to the needs of the case, as detailed in column "F".	Defendants state that the burden and expense of responding to this request is not proportional to the needs of this case because locating the information sought by this request would take at least 11 different people at least 15 hours each to gather and put in writing responsive information.		
	DR No. 62	Produce all documents concerning how Body Worn Camera video is collected and stored, including all documents concerning the protocols for preserving this video, the software used to house and/or manage this video, how this video is exported from the Body Worn Camera devices, and what audit trails and metadata are available regarding the Body Worn Camera devices and the video they create.	Defendants refer Plaintiffs to the information previously exchanged about Body Worn Camera collection and storage during meet and confers between the parties on February 3, 2022, February 15, 2022, as well as at the Court Conference with the parties on February 11, 2022 (see Tr., p. 25-45). Defendants also refer Plaintiffs to the manual referenced by Mr. Rickner during the Court Conference on February 11, 2022 (see Tr., p. 25-26), and to the information exchanged by the parties at the meet and confer between the parties in August 2021, referenced by Mr. Rickner during the Court Conference on February 11, 2021 (see Tr., p. 23-24).				
	DR No. 63	Produce all documents concerning the applications available on, data stored on, and usage of the tablets and smartphones provided to individual members of the NYPD, including, but not limited to, training materials used in training tablet and smartphone users.	Defendants will produce documents responsive to this request by the Court-ordered deadline. ITB and Chief of Training divisions are being searched for responsive documents.				
	DR No. 64	Produce all documents reflecting the deployment and use of video/photographic equipment in connection with each of the Protests that are required to be created under NYPD Patrol Guide 212-71 ("Guidelines for the Use of Video/Photographic Equipment by Operational Personnel at Demonstrations") and PG 212-72 ("Guidelines for Uniformed Members of the Service Conducting Investigations Regarding Political Activities"), including, but not limited to: the report required to be submitted to the NYPD's Legal Bureau according to ¶¶ 1-4 of PG 212-71 and all documents created as a result of or in response to it (such as Legal Bureau and Intelligence Division records reflecting compliance with the Handschu v. Special Services Division consent decree); the serially numbered log maintained by the NYPD's Technical Assistance Response Unit ("TARU") under ¶¶ 5-6 of PG 212-71 related to all TARU deployments on each date on which one of the Protests took place; TARU Job Reports from the TARU Job Tracker system, or other, similar documents, related to each use of video/photographic equipment related to one of the Protests; all records regarding requests made to obtain or review such recordings or photographs made in writing to the Deputy Commissioner, Legal Matters and whether such requests were granted; and all other documents required to be created under PG 212-71 that are in the possession of the NYPD's TARU, Legal Bureau, Chief of Department's Office, Operations Unit, and within each Bureau or Borough Command that requested the use of video or photographic equipment related to any Protest(s).	Defendants have previously produced TARU logs responsive to this request - See Defendants' production, Vol. 035 and Vol. 037. Defendants have searched for and located documents responsive to this request, including additional TARU logs, and are processing the documents located for production by the Court-ordered deadline.				
	DR No. 65	Produce all documents concerning the NYPD's use of data analytics and predictive policing as it relates to the policing of protesting, including how this technology was used to respond to the Protests.	No responsive documents exist.				
	DR No. 66	Produce all documents concerning the NYPD's Surveillance of participants of Protests online and their online activities, including all Surveillance by the NYPD's Social Media Analysis Research Team (SMART), Intelligence Division, or Counter-Terrorism Bureau.	Defendants have previously produced emails responsive to this request. Defendants have searched for documents responsive to this request, including "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division command and will produce any responsive documents by the Court-ordered deadline. Responsive documents can be found at: VOL035_Confidential				
	DR No. 67	Produce all documents concerning the use of facial recognition software on any video or photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.	No responsive documents exist.				
	DR No. 68	Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the location of where this data was stored; documents identifying how this data was cross-referenced with any other data in any other database.	No responsive documents exist.				
	DR No. 69	Produce all documents concerning the use of Stingray devices, or any other device that monitors cell phones, at the Protests, as well as documents concerning any information obtained using one of these devices, identifying the location of where such information is stored, and describing how it is analyzed.	No responsive documents exist.				

	DR No. 70	Produce all documents concerning the Mayor's contention that "what happened in Mott Haven . . . is something that the NYPD saw coming," including all documents concerning the Surveillance preceding the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) and all documents concerning any decision regarding the use of force at that Protest.	Defendants have previously produced documents and emails responsive to this request. Defendants have searched for documents responsive to this request, including "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division command and will produce any responsive documents by the Court-ordered deadline. Responsive documents can be found at: VOL001 VOL005_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL014_Confidential VOL017_Confidential VOL018_Not Confidential VOL022_Not Confidential VOL024_Not Confidential VOL035_Confidential			
	DR No. 71	Produce all documents concerning the Mayor's contention that "the NYPD has acted appropriately," after video emerged showing an NYPD SUV driving into a crowd of protestors on May 30, 2020.	Defendants have previously produced emails responsive to this request, in the "OTM" email volume. Defendants have searched for documents responsive to this request, including "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division command and will produce any responsive documents by the Court-ordered deadline. Defendants refer the plaintiffs to the video referenced, and any subsequent media coverage.			
	DR No. 72	Produce all documents concerning videos of Protests, from May 28, 2020 to June 3, 2020, that the Mayor viewed or that were shown to the Mayor on or before June 4, 2020.	Defendants have previously produced emails responsive to this request, as well as video footage. There is no document/documents that note the specific videos the Mayor viewed or was shown.			
	DR No. 73	Produce all documents concerning videos of protests from June 4, 2020, including, but not limited to, the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A), that the Mayor viewed or that were shown to the Mayor on or after June 4, 2020.	Defendants have previously produced emails responsive to this request, as well as video footage. There is no document/documents that note the specific videos the Mayor viewed or was shown.			
	DR No. 74	Produce all documents concerning videos of Protests on Schedule A that occurred after June 4, 2020, that the Mayor viewed or that were shown to the Mayor.	Defendants have previously produced emails responsive to this request, as well as video footage. There is no document/documents that note the specific videos the Mayor viewed or was shown.			
	DR No. 75	Produce all documents concerning Commissioner Dermot Shea's June 5, 2020 statement that the NYPD response to the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) was "executed nearly flawlessly," including any investigations into this statement and any discipline or recommendations of discipline that were made.	Defendants have previously produced emails and IAB/CCRB documents responsive to this request. Defendants have searched for documents responsive to this request, including "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division command and will produce any responsive documents by the Court-ordered deadline.			
	DR No. 76	Produce all documents concerning potential changes to policies or practices related to protest and/or disorder policing that Defendants considered or implemented as a result of evaluations of or recommendations related to Defendants' responses to the Protests, including, but not limited to, any internal NYPD evaluations or recommendations, evaluations or recommendations by Defendant de Blasio or any agency of Defendant City (such as the Office of the Inspector General, the Law Department, or the CCRB), or other evaluations, and including, but not limited to, responsive documents from the NYPD's Chief of Department, Operations Unit, Criminal Justice Bureau, Strategic Response Group, Disorder Control Unit, Legal Bureau, and Office of Management and Planning.	Defendants have previously produced emails responsive to this request. Defendants have searched for documents responsive to this request, including "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division command and will produce any responsive documents by the Court-ordered deadline.			
	DR No. 77	Produce all documents concerning the Office of the Inspector General of the New York City Police Department's ("OIG-NYPD") June 26, 2019 report entitled, "Complaints of Biased Policing in New York City: An Assessment of NYPD's Investigations, Policies, and Training," including all documents collected and reviewed during the course of investigating and then drafting the report.	Responsive documents to be provided. A privilege log will be provided for privileged documents.	To the extent that any responsive documents located are protected by privilege, Defendants will provide a relevant privilege log by the Court-ordered date.		
	DR No. 78	Produce all documents concerning the NYPD's decision to reject the three recommendations by the OIG-NYPD presented in the June 26, 2019 report, which stated: (1) the "NYPD should amend its Patrol Guide policies to explicitly require NYPD officers and non-uniformed employees to report instances of biased policing upon observing or becoming aware of such conduct"; (2) the "NYPD should amend its Patrol Guide policies so that complaints alleging the use of offensive or derogatory language associated with an individual's actual or perceived protected status, such as racial slurs, are classified as biased policing if there is a discriminatory intent"; and (3) the "NYPD should amend its written investigative procedures related to biased policing so that offensive or derogatory language associated with an individual's actual or perceived protected status, such as an officer's use of racial slurs, is classified, investigated, and adjudicated as a biased policing matter."	Responsive documents to be provided. A privilege log will be provided for privileged documents.	: To the extent that any responsive documents located are protected by privilege, Defendants will provide a relevant privilege log by the Court-ordered date.		
	DR No. 79	Produce all documents concerning the President of the NYPD Sergeants Benevolent Association's circulation of a racist video in August 2019, as described in paragraph 157 of the Sierra First Amended Complaint (Dkt 98), including any investigations into this action and any discipline or recommendations of discipline that were made.	Defendants refer Plaintiffs to the documents responsive to this request produced via email on March 8, 2022. No further documents exist, after a search of IAB, Chief of Department, Group 1, Group 25, Police Commissioner's office. A meet and confer must be scheduled to discuss further.			

	DR No. 80	Produce every document that shows which officers wore what helmet numbers on the days on which the Protests occurred; if you are unable to conclude the answer with certainty, provide every log and other document that reflects which helmet numbers were assigned to what officers on the days of the protests.	: Defendants have previously provided Plaintiffs with responsive documents listing the names and helmet numbers of SRG Officers who were present at the Protests. Defendants state that for all other officers,(1) the number on their helmet is the officer's shield number, or (2) if the officer is of a rank that does not have a shield number, the number on their helmet may be the officer's previous shield number.			
	DR No. 81	Produce every document concerning Defendants' policies and practices concerning distribution of protective gear by SRG officers and SRG protective helmet numbers.	No responsive documents exist.			
	DR No. 82	Produce all documents concerning the NYPD's 2021 First Amendment Policy ("Response to First Amendment Activities" available at https://www1.nyc.gov/assets/nypd/downloads/pdf/public_information/draft-1a-activities-forpublic-comment-2021-05-27a.pdf), its request for comment on the draft policy, the NYPD's consideration of such comments (and other factors) in developing the First Amendment Policy, and the final policy adopted.~	Defendants refer Plaintiffs to the New York City Police Department - Process of Developing the NYPD Response to First Amendment Activities Procedure and Response to Public Comments, available at https://www1.nyc.gov/assets/nypd/downloads/pdf/public_information/1st-amendment-public-comment-abstract.pdf ; and to the final policy adopted, "Response to First Amendment Activities", effective 9/10/21 and available at https://www1.nyc.gov/assets/nypd/downloads/pdf/public_information/213-20.pdf . Defendants have searched for additional documents responsive to this request, including "49s," on the shared drives of the Police Commissioner's Office, Chief of Department, Chief of Patrol, Operations, Legal Bureau, Internal Affairs Bureau, Criminal Justice Bureau, and Strategic Response Group commands and are processing the documents located for production by the Court-ordered deadline. Defendants are in the process of completing a search of the shared drive of the Intelligence Division command and will produce any responsive documents by the Court-ordered deadline.	To the extent that any responsive documents concerning consideration of comments or other factors located are protected by the deliberative process privilege or the attorney-client privilege, Defendants will provide a relevant privilege log by the Court-ordered date.		
	DR No. 83	Produce documents concerning the NYPD's activities relating to any marches, protests, or demonstrations occurring on or about June 26-27, 2021, including but not limited to any such documents relating to protests organized by the Reclaim Pride Coalition.	Responsive documents to be provided prior to Court-ordered deadline			
	DR No. 84	Produce any and all documents or communications between Defendants and any borough District Attorney's Office relating to mass arrests that resulted in dispositions that include decline to prosecute.	Responsive documents for the protests on "Schedule A" to be provided prior to Court-ordered deadline.	Documents concerning any prior protests are irrelevant and not proportional to the needs of the case.		
	DR No. 85	Produce any and all documents concerning policy or practice changes, changes in training, or FINEST messages that were in some way a response to the judgment in Abdell v. City of New York, No. 05 Civ. 8453 (RJS) (S.D.N.Y.) and/or Gersbacher v. Winski, No. 14 Civ. 7600 (S.D.N.Y.); the settlement in Rodriguez, Williams, James, et al v. City of New York, 12-cv-03389 (S.D.N.Y.); or the District Court summary judgment decision in Dinler v. City of New York 1:04-cv-7921 (S.D.N.Y.) (Dkt. No. 312 therein).	No responsive documents exist			
	DR No. 86	Produce any and all documents concerning policy or practice changes, changes in training, or FINEST messages that were in some way a response to the settlement of the RNC cases, including but not limited to MacNamara, et al., v. City of New York, et al., 04 Civ. 9216 (KMK)(JCF) (S.D.N.Y.).	No responsive documents exist			
	DR No. 87	Produce any and all documents concerning policy or practice changes, changes in training, or FINEST messages that were considered or adopted in some way a response to the events and lawsuits described in ¶¶ 421-429 of the Second Amended Complaint (Dkt 96).	No responsive documents exist			
	DR No. 88	Produce all documents concerning persons at the June 4, 2020, Mott Haven Protest (Protest No. 44 on Schedule A) throwing plastic bottles containing liquids and/or Molotov cocktails (including but not limited to identifying videos depicting such acts).	Responsive documents previously provided. Any additional responsive document will be provided prior to the Court-ordered date. Responsive documents can be found at: VOL001 VOL005_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL014_Confidential VOL017_Confidential VOL018_Not Confidential VOL022_Not Confidential VOL024_Not Confidential VOL035_Confidential			
	DR No. 89	Produce all documents concerning an attempt by someone at the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) to throw a wheelbarrow onto members of the service (including but not limited to identifying videos depicting such an act).	Responsive documents previously provided. Any additional responsive document will be provided prior to the Court-ordered date. Responsive documents can be found at: VOL001 VOL005_Not Confidential VOL008_Confidential VOL008_Not Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL014_Confidential VOL017_Confidential VOL018_Not Confidential VOL022_Not Confidential VOL024_Not Confidential VOL035_Confidential			

	DR No. 90	Produce all documents concerning the alleged stabbing of an NYPD officer at the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A), including but not limited to videos depicting such an act, records concerning medical treatment for the injury, documents concerning the weapon that was used, and the identity of the perpetrator and any arrest or prosecution documents.	Responsive documents previously provided. Any additional responsive document will be provided prior to the Court-ordered date. Responsive documents can be found at: VOL001 VOL005_Not Confidential VOL008_Confidential VOL009_Confidential VOL010_Confidential VOL011_Confidential VOL011_Not Confidential VOL014_Confidential VOL017_Confidential VOL018_Not Confidential VOL022_Not Confidential VOL024_Not Confidential VOL035_Confidential			
	DR No. 91	Produce all documents, including, but not limited to, NYPD and CCRB documents, and documents reflecting communications between the NYPD and CCRB, concerning the CCRB's "unprecedented challenges in investigating" complaints arising from the Protests, including, but not limited to, the CCRB's inability to identify "officers due to the failure to follow proper protocols, officers covering their names and shield, officers wearing protective equipment that did not belong to them, the lack of proper use of body worn cameras, as well as incomplete and severely delayed paperwork" (from CCRB 2020 Protest Data Snapshot -- June 21, 2021).	Responsive documents, to the extent any exist will be produced prior to the Court ordered deadline. Logs/documents in the CCRB files previously produced note "challenges," if any.			
	DR No. 92	Produce all radio transmissions concerning the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) in complete form, i.e., not a combined set of transmissions, but the complete transmission from each source point.	ICAD's to be produced, as previously discussed. Radio transmissions are available at VOL005_Not Confidential VOL010_Confidential			
	DR No. 93	Produce all documents concerning Aviation Surveillance of the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A), including but not limited to orders, directives, instructions, and communications.	Flight data reports to be provided, as previously discussed			
	DR No. 94	Produce all documents concerning all NYPD investigations into the conduct of Sergeant Edward Mulline concerning his distribution of a racist video clip in August 2019, and concerning the February 2021 CCRB substantiation of three complaints against him for offensive language and abuse of authority.	Defendants refer Plaintiffs to the documents responsive to this request produced via email on March 8, 2022. No further documents exist, after a search of IAB, Chief of Department, Group 1, Group 25, Polie Commissioner's office.			
	DR No. 95	Produce all documents concerning any NYPD investigation into the display of a "white power" symbol by any NYPD officer since January 1, 2014.	Responsive documents to be provided prior to the Court-ordered deadline. IAB, Chief of Department office are being searched.			
	DR No. 96	Produce all documents concerning any NYPD investigations into the statements and conduct of Deputy Inspector James Kobel.	Responsive documents to be provided prior to the Court-ordered deadline. IAB, Chief of Department office are being searched.			
	DR No. 97	Produce all documents concerning complaints of biased policing by NYPD officers since January 1, 2014.				
	DR No. 98	Produce all documents concerning oral or written statements by NYPD officers reflecting racial bias by that officer since January 1, 2014.	Responsive documents to be provided prior to the Court-ordered deadline. IAB, Chief of Department office are being searched.			
	DR No. 99	Produce all complaints to the NYPD (whether formal or simply a report of information to the NYPD) and investigations since January 1, 2014, concerning racist statements or conduct by an NYPD officer, regardless of whether the statement or conduct took place during, or outside of, the officer's course of employment.	Responsive documents to be provided prior to the Court-ordered deadline. IAB, Chief of Department office are being searched.			
	DR No. 100	Produce all Documents created by the New York City Emergency Management (NYCEM) concerning any of the Protests, including but not limited to emails and/or alerts from the NYCEM Watch Command.	Sample responsive documents have been produced, the remainder of the documents will be produced prior to the Court-ordered deadline			
	DR No. 101	Produce all documents referenced in your Answers to the Complaints to the extent they have not been produced in response to other Requests.	None	Defendants object to Document Request No. 101 on the grounds that this request is vague and overbroad insofar as it does not specify the documents plaintiffs contend have not been produced.		